

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA - NORTHERN DIVISION

BETTY ANN BURKS, <u>et al.</u> ,	:	
	:	
Plaintiffs,	:	
	:	
v.	:	No. 2:06-CV-1081-MEF
	:	
EQUITY GROUP-EUFAULA	:	
DIVISION LLC,	:	
	:	
Defendant.	:	

TRIAL WITNESS DISCLOSURE OF
EQUITY GROUP - EUFAULA DIVISION, LLC.

Pursuant to Rule 26(a)(3), F.R.C.P., and the Court's Scheduling Order of March 13, 2007, defendant Equity Group - Eufaula Division, LLC ("Equity") makes the following witness disclosure:

A. CURRENT AND FORMER REPRESENTATIVES OF EQUITY.

Each of the following current and former representatives of Equity can be contacted through counsel for Equity, c/o Pelino & Lentz, P.C., One Liberty Place, 32nd Floor, Philadelphia, PA 19103, 215-665-1540.

1. Robin Stevens (Expect To Call)
2. Jim Bice (Expect To Call)
3. Greg Mills (Expect To Call)
4. Joe Preston (Expect To Call)
5. Kathy Gilmore (Expect To Call)
6. Tim Esslinger (Expect To Call)
7. Spence Jarnagin (Expect To Call)
8. Shauna Bouterse (Expect To Call)
9. LaConya Hawkins (May Call)

10. Randy Cline (May Call)
11. Ricky Lewis (May Call)
12. Butch White (May Call)
13. Tim Lawson (May Call)
14. Larnal Davis (May Call)
15. Charles Baxter (May Call)
16. Vicki Wentland (May Call)
17. Marilyn Smith (May Call)
18. Ree Allen (May Call)
19. Patrick Spencer (May Call)
20. Casi Ortiz (May Call)
21. Miguel Strofer (May Call)
22. Cornell Green (May Call)
23. Neal McCoy (May Call)
24. Leon Bowen (May Call)
25. James McElroy (May Call)
26. Sara Lynn (May Call)
27. Dee Green (May Call)
28. Anthony Smith (May Call)
29. Seretha Nelson (May Call)
30. Sampson Reeves (May Call)
31. Donna Bell (May Call)
32. Teresa Drake (May Call)
33. Sharonda Patrick (May Call)
34. Ken Kris (May Call)
35. Margaret Griffen (May Call)
36. Faith Avelleda (May Call)

37. Shundra DeVorse (May Call)
38. Levern Johnson (May Call)
39. Kathleen Baryard (May Call)
40. Daisy Washington (May Call)
41. Tim Nolan (May Call)
42. Ida Toney (May Call)
43. Tonya Jones (May Call)
44. Leon Jones (May Call)
45. Shameka Green (May Call)
46. Miguel Strofer (May Call)
47. Candice Johnson (May Call)
48. AJ Owens (May Call)
49. Alexis Jones (May Call)

B. EXPERT WITNESS.

1. Stephan Konz
2834 Oregon Street
Manhattan, KS 66502
758-539-5921
(Expect to Call)

C. PLAINTIFFS.

Equity may call as of cross, if necessary, any of the following plaintiffs who are either named in the Amended Complaint or have otherwise filed Consents to Join in this matter, c/o Candis A. McGowan, Wiggins, Childs, Quinn & Pantazis, LLC, The Kress Building, 301 19th Street North, Birmingham, Alabama 35203, 205-314-0500:

1. Mary Allen
2. Virginia Avery
3. Lillie Banks

4. Teresa Baxter
5. James Bedell
6. Katina Binion
7. Dorothy Blackmon
8. Willie May Blackmon
9. Karen Bowens
10. Betty Ann Burks
11. Pearline Burks
12. Sharon Bush
13. Brenda Calhoun
14. Ethel Carter
15. Suevetta Coleman
16. Latoya Corbitt
17. Anthony Culver
18. Tiffany Cunningham
19. Barbara Darby
20. Laurie Delbridge
21. Cherry A. DuVose
22. Katrina Favors
23. Chanda L. Ferguson
24. Kenneth Ford
25. Salintha Foster
26. Shervonne Foster
27. Renata Fuller
28. Glenn Tangela
29. Annie Glover-Patrick
30. Thomas Gosha

31. Alfonza Green
32. Gloria Gullette
33. Jimmy Lee Hamilton
34. Brian Hanks
35. Larry Hicks
36. Annie Ivery
37. Andre Jackson
38. Johnny L. Jackson
39. Terrance Jackson
40. Molinda J. Jacobs
41. Annie R. Johnson
42. Cedric D. Johnson
43. Derinda Johnson
44. Jennifer T. Johnson
45. Bessie Jones
46. Lottie Jones
47. Patricia Jones
48. Arleen Kennedy
49. Shirley Kennedy
50. Tracy L. Kennedy
51. Steven L. Kincey
52. Evelyn Lampley
53. Serenda Lampley
54. Emily Laseter
55. Felicia Laseter
56. Christopher Laster
57. Eddie Lewis

58. Brenda Lightner-Slater
59. Margie B. Lohman
60. Atravous Mahone
61. Anthony B. March
62. Mary March
63. Elethia Marshall
64. Monroe McCall
65. Dianne McCloud
66. Gertha R. McCrae
67. Anthony McKinnon
68. Dorothy A. McNair
69. Renna Merrill
70. Shakeria Moore
71. Ebone Morris
72. Dorothy Mulkey
73. Tony Newman
74. Krista R. Oliver
75. Andrea Paige
76. Jennifer Parham
77. Juanita Jones-Parham
78. Valerie Parker
79. Antonio L. Pearson
80. Marquita Person
81. Benjamin Phillips
82. Johnnie Mae Posey
83. Coretta Y. Reeves
84. Marcus Terrell Rice

85. Calvin F. Richardson, Jr.
86. Denise Richardson
87. Laurie Jones Robinson
88. Margaret Robinson
89. Michael Robinson
90. Doris Sanders
91. Samuel Shabazz
92. Rose D. Shaw
93. Rebecca Shorter
94. Vivian Shorter
95. Gregory Siquefield
96. Kendrick Spann
97. Theresa Starling
98. Tiffany Starling
99. Anthony Streeter
100. Terrance Tennille
101. Larry Jerome Thomas, Jr.
102. Shemiece Thompkins
103. Lillian Thompson
104. Shereekia Thornton
105. Courtney Tolbert
106. Carolyn Turner
107. Dorsel Turner
108. Lakeshia E. Warren
109. Tarshekia Warren
110. Dornal Whigham
111. John Whigham

112. Patricia Whigham

113. Gary White

114. Wendy White

115. Albert William

116. Vernie Williams

117. Betty Young

118. Chanda Young

119. Santinia Young

To the extent that any of these witnesses fail to appear at trial, Equity reserves the right to utilize their deposition transcript and/or discovery responses, if available, in lieu of testimony in addition to seeking dismissal of their claims. Equity reserves the right to call, as of cross, any other plaintiff who has filed a Consent to Join in this matter, c/o Candis A. McGowan, Wiggins, Childs, Quinn & Pantazis, LLC, The Kress Building, 301 19th Street North, Birmingham, Alabama 35203, 205-314-0500.

D. THIRD PARTY WITNESSES.

1. Jacqueline Davis
16 South Avenue
Clayton, AL
334-775-9107
(Expect to Call)
2. Jerry Foster, Representative
Retail, Wholesale, and Department
Store Union
Alabama & Mid-South RWDSU Council
1901 10th Avenue South
Birmingham, AL 35205
205-322-7462
(May Call)

3. Henry Jenkins
International Vice President
Retail, Wholesale, and Department
Store Union
Alabama & Mid-South RWDSU Council
1901 10th Avenue South
Birmingham, AL 35205
205-322-7462
(May Call)

Equity reserves the right to call any witness identified by any other party to the litigation and to call, for purposes of rebuttal or impeachment, witnesses not identified by any party. Equity likewise reserves the right to supplement this list in advance of trial.

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Eufaula Division, LLC

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EQUITY GROUP EUFAULA	:	
DIVISION LLC,	:	
	:	
Defendant.	:	

CERTIFICATE OF SERVICE

The undersigned counsel for Equity Group-Eufaula Division, LLC hereby certifies that a true and correct copy of its Witness Disclosure in the above-captioned matter was filed electronically with the Clerk of Court on August 20, 2008 using the CM/ECF system, which will send notification of such filing to:

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